

**REMARKS**

Applicant hereby traverses the outstanding rejections and requests reconsideration and withdrawal in view of the remarks contained herein. Claims 20, 25 and 30 have been amended. Claims 20-34 are pending in this application.

**Rejection under 35 U.S.C. § 103 (Thackston in view of Wone)**

Claims 20, 24, 25, 29, 30 and 34 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,295,513 to Thackston (hereinafter, "Thackston") in view of U.S. Patent No. 6,393,422 to Wone (hereinafter, "Wone").

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the first or second criteria, Applicant asserts that the rejection does not satisfy the third criteria.

Claim 20, as amended, requires means for automatically logging discrete changes to the CAD elements resulting from the input commands in respective records, and means for generating a HTML report from the records to enable the user access to information related to changes in the CAD elements. Claim 25, as amended, requires automatically logging discrete changes to the CAD elements as a result of the input commands in respective records and generating, by the collaboration server, a HTML report from the records to enable user access to information related to changes to the CAD elements. Claim 30 requires that the collaboration server application identify discrete changes to the CAD elements, create a log of the discrete changes, and generate a hypertext markup language (HTML) report to enable user access to information related to changes to the CAD elements, wherein the HTML report is provided to each client to enable CAD users to review each change made to CAD elements during the design session while the design session is occurring.

The Examiner has taken the position that Thackston teaches these limitations, Wone is not relied upon as teaching these limitations. Applicant respectfully disagrees with the Examiner's characterization of Thackston. The Examiner has stated that Thackston discloses a collaboration server application which identifies discrete changes to the CAD elements (citing Figure 2; Abstract, lines 8-13; column 2, lines 14-48; column 3, lines 30-35; and column 14, lines 30-51), and creating a log of said discrete changes (citing Figure 1). Applicant respectfully disagrees with the Examiner's characterization of each of these portions of Thackston.

Thackston does not disclose a collaboration server identifying discrete changes to the CAD elements as a result of the input commands as stated by the Examiner. Instead Thackston discloses a virtual collaborative environment with a product data management (PDM) capability which manages access to controlled data and maintains a record of various manifestations of the designs. Column 4, lines 59-65. Further, in Thackston, whenever an authorized team member accesses a part design model or specification, the team member is said to have checked out the item. After the team member completes the task he has to check in the item, where corresponding entries are made in a check out/check in record. Column 14, line 31-column 15, line 3. These check in/check out, or session, or transaction records, which record user/log in information (column 14, lines 31-51 and column 40, lines 50-56), are the only types of records that are recorded by Thackston. Thackston may store other types of documents, but the information included in those documents is never disclosed as being logged or recorded by the system of Thackston. As a result, Thackston never discloses, and Wone is not relied upon as disclosing, the collaboration server identifying discrete changes to the CAD elements as a result of the input commands, as required by claim 30, nor logging discrete changes to the CAD elements as a result of the input commands, as required by claims 20 and 25.

Additionally, Figure 1 is referenced as showing creating a log of the discrete changes. Applicant respectfully disagrees. The specification of Thackston states that Figure 1 merely depicts the activities performed over time by the design personnel. *See* col. 1, line 65 through col. 2, line 21. Figure 1 of Thackston does not refer to the operation of any computer system or server much less to the creation of a log of discrete changes.

Next, the Examiner states that Thackston discloses the generation of a HTML report to enable user access to information related to changes to the CAD elements. Again, Applicant

respectfully disagrees. As stated above, Thackston does not collect the information required by this limitation, therefore Thackston cannot create a report related to changes in CAD elements. The citations to Thackston supplied by the Examiner are consistent with this deficiency. The columns 6 and 10 citations do not discuss reports, but only the systems ability to receive HTML, and the columns 40 and 46 citations allow for the check out/check in, session, transaction records of the type discussed in columns 14 and 40 of Thackston. Nowhere does Thackston disclose, and Wone is not relied upon as disclosing, an HTML report from said records to enable user access to information related to changes to said CAD elements as required by claim 20, generating, by said collaboration server, an HTML report from said records to enable user access to information related to changes to said CAD elements, as required by claim 25, or an HTML report is provided to each client to enable CAD users to review each change made to CAD elements, as required by claim 30.

With regard to the Examiner's assertion that Wone discloses an HTML report is provided to each client to enable CAD users to review each change made to CAD elements during the design session while the design session is occurring citing column 1, lines 20-30, column 2, lines 19-22, column 4, lines 43-52, and column 7, lines 12-17, Applicant respectfully disagrees with the Examiner's characterization of Wone. Wone discloses a method and system for dynamically generating HTML reports from large amounts of data extracted from an SQL database. Column 1, lines 20-25; column 4, lines 41-55. Wone further provides a method for viewing and navigating between dynamically generated HTML reports. Column 2, lines 19-22; column 7, lines 4-24. Wone does not disclose, and the Examiner admits that Thackston does not disclose, enabling CAD users to review each change made to CAD elements during said design session while said design session is occurring as required by claim 30. Wone disclosing only generating and viewing HTML reports without any mention of doing so while a user engages in other applications, much less CAD applications or design sessions.

As the combination put forth by the Examiner does not teach any of the limitations described above, Applicant respectfully requests the rejection of claims 20, 25 and 30 based on the combination of Thackston and Wone be withdrawn.

Claims 24, 29 and 34 depend from claims 20, 25 and 30, respectively, and therefore inherit all the limitations thereof. For at least the reasons set forth above claims 24, 29 and 34 are allowable over the combination of Thackston and Wone.

**Rejection under 35 U.S.C. § 103 (Thackston in view of Wone and further in view of Tanigawa)**

Claims 21-23, 26-28 and 31-33 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Thackston in view of Wone and further in view of U.S. Patent No. 5,694,544 to Tanigawa et al. (hereinafter, "Tanigawa").

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the first or second criteria, Applicant asserts that the rejection does not satisfy the third criteria.

Claims 21-23, 26-28, and 31-33 respectively depend from base claims 20, 25, and 30, respectively and, therefore, inherit all limitations of their respective base claim, and are therefore allowable for at least the reasons set forth above.

**Conclusion**

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 08-2025, under Order No. 20001760-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV482709165US in an envelope addressed to: MS AF, Commissioner for Patents, Alexandria, VA 22313.

Date of Deposit: November 10, 2005

Typed Name: Elise Perkins

Signature: Elise Perkins

Respectfully submitted,

By: Michael J. Fogarty, III  
Michael J. Fogarty, III  
Attorney/Agent for Applicant(s)  
Reg. No. 42,541  
Date: November 10, 2005  
Telephone No. (214) 855-8172